



DEPARTMENT OF LAW

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CITY OF TRENTON
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R. DENISE LYLES
DIRECTOR OF LAW

February 16, 2010

VIA FACSIMILE AND REGULAR MAIL

Honorable Tonianne J. Bongiovanni, U.S.M.J.
U.S. District Court, District of New Jersey
Clarkson S. Fisher Federal Building & Courthouse
402 East State Street, Room 6052
Trenton, New Jersey 08608

RE: Hall White v. City of Trenton, et al.
Civil Action Number 06-05177 (FLW-TJB)

RECEIVED
MAR - 1 2010
AT 8:30
WILLIAM T. WALSH
CLERK

Dear Judge Bongiovanni:

Our office represents Defendants City of Trenton and its employee, Director Joseph J. Santiago ("Defendants"), in the above-referenced matter. At this stage of the case, I understand that counsel is being appointed for Plaintiff Hall White, who currently is not represented by counsel. The purpose of this letter is to request a temporary stay of any proceedings until Monday, May 17, 2010 for the following reasons.

As Your Honor may be aware from other matters before the Court, I am in the latter stages of pregnancy and expect to deliver in early March, if not sooner. Afterwards, I will be taking maternity leave to care for our child. Presently, my office does not have sufficient staff to handle all of my cases during my leave, and budgetary constraints prevent my office from retaining temporary counsel to handle my cases. I would expect that once counsel is appointed for Mr. White, a certain amount of time will be given to the new attorney to familiarize himself or herself to this case. Provided that my expectation is the case, I would respectfully request that any proceedings on this matter take place after Monday, May 17, 2010, the latest date that I anticipate returning to the office on leave. Because Mr. White is currently representing himself, I have not contacted him regarding this request.

02/16/2010 14:20

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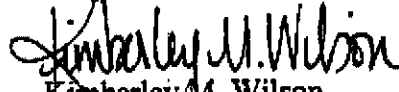
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PAGE 03/03

Honorable Tonianne J. Bongiovanni, U.S.M.J.
U.S. District Court, District of New Jersey
February 16, 2010
Page 2

Should Your Honor have any questions or concerns regarding this request, certainly feel free to contact me.

Respectfully submitted,


Kimberley M. Wilson
Assistant City Attorney

KMW:agl

cc: Hall White (via regular mail)
John Morelli, Esq. (via facsimile and regular mail)

Based on the foregoing, Coupled with the Court's efforts to obtain pro bono Counsel for Plaintiff, this matter is administratively terminated. A telephone Conference shall be conducted on May 16, 2010 at 10:30. Counsel for the City of Trenton shall initiate the call. In the meantime, the Court shall appoint new Counsel for Mr. White.

So Ordered this 1 day
of March, 20 10



RE: Civil Action (ASE # 06-05177(FLW-TJB) 2/17/10

The Honorable
Judge Torianne J. Bongiovanni (U.S.M.J.)
U.S. District Court, District of New Jersey
Clarkson S. Fisher Federal Bldg. & Courthouse
402 East State St., Rm. 6052
Trenton, New Jersey 08608
Fax # 609-989-0435

Good Afternoon, Your Honor:

I wish to inform you, Your Honor, that I received ^{a copy of} attorney Kimberly M. Wilson's letter to you of 2/16/10, in which she requested that you grant temporary stay of any proceedings in the matter, (Hall White V. City of Trenton, et al./ Civil Action Number 06-05177 FLW-TJB) until Monday, May 17, 2010 due to her unborn expectancy and maternity leave.

Relative to the above, Your Honor, I have not hold no objection. It is my understanding Your Honor that you are actively seeking replacement of attorney Ballarotto for Plaintiff. I thank ^{very} you, whole-heartedly, Your Honor

58 Tyrell Ave.
Trenton, NJ 08638

Very Respectfully,
Hall White, Plaintiff
609-394-1538 phone #